

## **THE LAW OFFICE OF JAMES J. RUFO**

---

1133 WESTCHESTER AVENUE, SUITE N-202 • WHITE PLAINS, NEW YORK 10604  
PHONE (914) 600-7161 • CELL (845) 590-5187 • [WWW.NYBKATTORNEY.COM](http://WWW.NYBKATTORNEY.COM)

---

July 7, 2022

**VIA ECF**

Hon. Sean H. Lane  
US Bankruptcy Court  
Southern District of New York  
300 Quarropas Street, Room 147  
White Plains, NY 10601

**Re:** Casabella Contracting of N.Y., Inc., Chapter 11, Case No. 22-22205 (SHL)  
Case Management Status Conference – July 7, 2022, at 3:00 P.M.

Dear Judge Lane:

Please accept the following status report and proposed agenda for the debtor and debtor-in-possession Casabella Contracting of N.Y., Inc. (the “Debtor”) in advance of the Case Management Status Conference on July 7, 2022, at 3:00 P.M.

**I. Case Management Status Conference**

- a. Status of Collection of Receivables from Richards Plumbing and Heating, CO., Inc. Expect to finalize settlement on or before July 31, 2022.
- b. Richards and the Debtor entered a total of seven (7) written agreements six (6) with the New York City Housing Authority and one (1) with the New York Health & Hospitals Corporation (“NYCH&H”) whereby Richards agreed to furnish certain work, labor, materials, and services in connection with the seven (7) projects (collectively, the “Projects”) known as:

- i. Metropolitan Hospital Project: Value = **\$52,588.25**
- ii. Rangel Houses Project: Value = **\$85,522.82**
- iii. Marlboro Houses Project: Value = **\$0.00**
- iv. Riis Houses Project: Value = **\$59,286.54**
- v. Wilson Houses Project: Value = **\$35,164.7**
- vi. Smith Houses Project: Value = **\$7,411.10**
- vii. Grant Houses Project: Value = TBA

**Total Estimated Value: \$239,973.41**

## **THE LAW OFFICE OF JAMES J. RUFO**

---

1133 WESTCHESTER AVENUE, SUITE N-202 • WHITE PLAINS, NEW YORK 10604  
PHONE (914) 600-7161 • CELL (845) 590-5187 • [WWW.NYBKATTORNEY.COM](http://WWW.NYBKATTORNEY.COM)

---

July 7, 2022

II. **Status Conference Re: Insurance –**

- a. Correspondence from North American Marketing Specialists, Inc. (“NAM Spec.”) with insurance quote – expects vehicles insured by Friday, July 8, 2022
  - i. Vehicle List
  - ii. Maltz Estimated Valuation of Vehicles and Equipment (\$389,000.00) (Annexed hereto as **Exhibit “A”** is the Letter from NAM Spec., Vehicle List, Maltz Estimated Valuation).

III. **Doc. #44 Ex Parte Application for FRBP 2004 Examination of Frank Pignataro Ex Parte Application for FRBP 2004 Examination of Frank Pignataro**

- a. Doc. #47 Letter Filed by Todd S. Cushner on behalf of Frank Pignataro
- b. Doc. #50 Letter re: Debtor's Reply to Letter filed at ECF #47
- c. Doc. #67 Letter Consenting to 2004 Document Request/ 2004 Exam and Request for Withdrawal of Letter Filed on June 13, 2022 at Doc. No.: 47

IV. **Doc. #45 Ex Parte Application for FRBP 2004 Examination of Ryan Chianelli**

V. **Doc. #46 Motion for Contempt For Violation Of This Courts Temporary Restraining Order, Dated May 4, 2022**

- a. Doc. #68 Ex Parte Opposition by receiver, Frank Pignataro
- b. Doc. #73 Debtor’s Response Reply in Further Support of Debtor's Motion

VI. **Doc. #51 Motion For An Order To Convert Or Dismiss Chapter 11 Case (Filed On Shortened Notice)**

- a. Doc. #61 Opposition of Principal Marcela Pignataro to UST Motion
- b. Doc. #63 Opposition to the US Trustee's Motion to Convert Chapter 11 Case to Chapter 7 or Dismiss Case
- c. Doc. #74 Reply to Motion /notice of lapsed insurance

VII. **Doc. #57 Election To Proceed Under Subchapter V**

Thank you for your timely attention to this matter.

Sincerely yours,

*/s/ James J. Rufo*  
James J. Rufo, Esq.  
Proposed Attorney for the Debtor